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**By Email and ECF**

October 18, 2017

AUSA Leah Foley  
United States Attorney's Office  
One Courthouse Way, 9th Floor  
Boston, MA 02110

Re: United States v. Cordero, et al., No. 16-cr-10337 (DJC)

Dear Leah:

We represent Amable Diaz, defendant number 18, in the above-referenced case. We write pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Local Rules 116.1 through 116.3 to confirm that the evidence your office has produced regarding Mr. Diaz is complete, other than any additional discovery pursuant to LR 116.2(B)(2)-(4), "Jencks Act" materials, or expert discovery that may be produced at a later date.

We have received and reviewed the following discovery produced by your office:

1. 2/8/17 automatic discovery letter;
2. 2/6/17 discovery letter containing CD of USAO-00001 – 0002989;
3. 3/2/17 discovery letter containing encrypted thumb drive with "new format," Package Explorer User Guide, and cheat sheet;
4. 3/13/17 discovery letter containing two (2) DVD/CDs, one containing DEA reports (USAO-004952-005493), and the other containing .pdf line sheets of Target Telephones;
5. 3/17/17 discovery letter containing one CD of Mr. Diaz's pertinent line sheets and audio;
6. 3/24/17 discovery letter containing one CD of reformatted material already produced;
7. 4/6/17 discovery letter containing one thumb drive (USB drive) containing an excel spreadsheet, and related exhibits (USAO-00052666-00198085);

8. 4/12/17 email from your office attaching DEA reports and DEA lab drug analyses (USAO-0198086-0198109); and
9. 7/17/17 email from your office attaching USAO-0198110 (lab report for Exhibit 89), and a corresponding DEA 7 Report.

In a telephone conversation today with Mr. Thomas Barry of your office, he confirmed that this is all of the discovery produced by your office to date.<sup>1</sup>

This letter seeks reconfirmation that we have received a complete set of discovery from your office and that there are no other documents, reports, and/or audio/video surveillance that have not been produced as they may relate to the charges or allegations against Mr. Diaz described above.

We look forward to your response. Please feel free to contact us if you have any questions or concerns.

Best regards,

/s/ Inga L. Parsons

Inga L. Parsons

/s/ Christian J. Urbano

Christian J. Urbano

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*Attorneys for Defendant*

*Amable Diaz*

### **CERTIFICATE OF SERVICE**

I, Christian J. Urbano, hereby certify that on October 18, 2017, I caused a copy of this document to be served by the Court's CM/ECF System on all counsel of record, and on AUSA Leah Foley by email at Leah.Foley@usdoj.gov.

/s/ Christian J. Urbano

Christian J. Urbano

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<sup>1</sup> Mr. Barry also informed me that he would determine whether the gaps in Bates numbering are meaningful.